

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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**CARDILLO & SONS, INC.,**

**Plaintiff,**

**v.**

**OFFICIAL SECURITY, INC.  
MRH INTERNATIONAL, INC.,  
DARRYL CRONFELD, and  
MARGARET R. CRONFELD,**

**Defendants.**

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**CIVIL ACTION NO. 04-12496-JLT**

**AFFIDAVIT OF WALTER CARDILLO**

1. My name is Walter Cardillo and I am an adult Massachusetts resident.
2. I am a project manager for Cardillo & Sons, Inc. (“CSI”) and am responsible, with my wife Denise Cardillo, for the performance of CSI’s contractual obligations to the federal Transportation Safety Administration (the “TSA”) and its prime contractor CPS Human Resource Services (“CPS”).
3. CSI is engaged in the security services industry and is a direct competitor of the defendants Official Security, Inc. (“OSI”) and MRH International, Inc. (“MRH”). CSI, OSI and MRH have competed and continue to compete for various contracts, including competition for contracts in Massachusetts relating to the provision of security services at various assessment sites throughout the United States where the TSA and CPS conduct assessments of candidates for airport security positions.
4. I have reviewed the Plaintiff’s First Amended Complaint filed in this matter and hereby verify that all factual assertions made therein are true to the best of my knowledge and

that the averions asserted “on information and belief” are made in good faith and are believed to be true.

5. I understand, from the CPS contract bid procedures and documents relating thereto, that CPS has awarded security contracts in part, on the belief that the security contractors are minority or women-owned businesses.

6. I understand that the defendants Daryl Cronfeld and/or Margaret Cronfeld have affirmed to CPS that OSI is a woman-owned business.

7. OSI has conducted business in Massachusetts pursuant to the TSA/CPS contract. Specifically, I am aware that OSI provided security personnel at Martha’s Vineyard airport during the summer of 2004 pursuant to the TSA/CPS contract.

8. CSI and OSI recently bid against one another for the provision of security services at all of the soon to be established permanent Hiring Centers, including a Hiring Center to be established in the Boston area.

**SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON THIS 18<sup>TH</sup> DAY OF MARCH, 2005.**

/S/ Walter Cardillo, Jr.  
Walter Cardillo, Jr.